HEALTH COPILOT AI

Program Delivery Modality Classification Framework

Reporting Categories and Proposed Rule Language for the Florida Commission for Independent Education

Prepared by **Health Copilot AI**

Author: **Troy A. Stefano, PhD**

Prepared for: Commission for Independent Education (CIE) staff and licensed institutions

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1. Purpose and Approach

Institutions licensed by the Commission describe program delivery as "online," "hybrid," "blended," "residential," "HyFlex," and so on, and they use these terms inconsistently. The Commission's current forms add to the problem. The Program Outline offers *Campus / Online / Correspondence / Other*, a list that mixes levels and has no option for hybrid. The Online Program Addition form (Form A) uses different terms for the same information.

This framework is about **capturing information, not defining programs**:

- **The institution defines its program.** It decides what students must complete, how each part is delivered, and how it counts instruction. The Commission evaluates that proposal against its standards (Rule 6E-2.004, F.A.C.) and against any requirements that state or national licensing bodies set for the field (Rule 6E-2.008(1)(b), F.A.C.). This framework does not add program requirements.
- **The framework supplies the categories used to record it.** It provides a shared vocabulary for reporting delivery, built from terms already in Rule 6E-1.003, F.A.C.: in-person or distance (Direct and Indirect Contact Instruction) and, for distance, synchronous or asynchronous. It adds one separate question every program answers: what AI does in its instruction, recorded by function (teaches content, tutors or gives feedback, personalizes learning paths, assesses student learning). With a shared vocabulary, reports can be compared across institutions.
- **Everything else stays in the institution's own words.** How the institution runs its live sessions, how instructors interact with students, and how it uses software are described in the program description and the documentation the rules already ask for. The Commission reviews those descriptions. It does not prescribe them.

This follows the Commission's stated intent in Rule 6E-2.0041(1), F.A.C., that its standards "shall not unreasonably hinder educational innovation and competition." It also follows the disclosure basis of fair consumer practices (Section 1005.04, F.S.; Rule 6E-1.0032, F.A.C.).

The framework provides:

1. **A hierarchy of definitions** that shows which terms apply at which level (Section 3).
2. **Program-level delivery labels** derived from that hierarchy (Section 4).
3. **A small revision to the Program Outline (Forms 301 and 302)**: four short checkbox rows in the framework's words and one course-table column, assessed for burden against value (Section 6).
4. **Staff review prompts** that connect the answers to existing rule requirements (Section 8).
5. **Lean draft rule language** (Section 10).

2. Guiding Principles

P1. Report what the program requires. The delivery label records how the instruction the institution's program requires is delivered. The institution sets those requirements in its program outline.

Activities the institution offers but does not require (optional sessions, open labs, tutoring, library access, support services) do not change the label. For Online programs, the form notes only whether optional in-person components (for example an internship, lab, or tutoring) are offered.

P2. Report the hours the institution counts as instruction. The institution decides what it counts as instruction in its clock or credit hours. A credit hour already separates hours of *instruction* from "a reasonable period of time outside of instruction" (Rule 6E-1.003, F.A.C.). Homework, reading, or study that the institution does not count as instruction is not reported as delivery, so posting assignments online does not by itself make a program online or hybrid.

P3. Terms belong to a level. Synchronous and asynchronous describe *distance instruction only*. They have no meaning for in-person instruction. Hybrid and blended are *summary labels for a whole program* derived from its components. They are not kinds of instruction. AI in instruction is a different question altogether (what software does in the instruction), so it applies to in-person and distance instruction alike and does not change the label.

P4. Report a choice of attendance as optional in-person. If the institution lets a student attend a required session either in person or at a distance (often called "HyFlex"), the session is reported as distance instruction, and the in-person option as an optional in-person component. This is a reporting convention. It records the route a student could actually take; it does not restrict the design.

P5. Describe rather than prescribe. Beyond the shared reporting categories, the institution describes its own practice in its own words, for example what makes a session synchronous in its program, how instructors interact with students, and how it uses software. The Commission reviews these descriptions. It does not set a standard for them.

P6. Pedagogy is not delivery. "Flipped," "cohort-based," "competency-based," "self-paced," and "accelerated" describe instructional design or pacing. They appear in the program description, not in the delivery classification.

P7. Classification is not approval. A delivery label records the institution's proposal. It shows which existing rule requirements staff should look at. It does not approve or disapprove anything, and it does not set requirements for the program.

3. The Hierarchy of Definitions

Delivery terms work at different levels. Each term has meaning only under its parent. The prior draft's main source of confusion was treating terms from different levels as peers. Examples are "Blended" next to "In-person," and "Correspondence" next to "Campus."

Level	Hierarchy of definitions	Who defines it
Level 0 scope	**REQUIRED INSTRUCTION** *(optional activities sit outside the tree; for Online programs, optional in-person components are noted)*	**Institution-defined** Defined by the institution's program; P1, P2
Level 1 location	├─ **IN-PERSON INSTRUCTION** *setting: classroom · laboratory · externship/clinical site (already reported as Theory/Lab/Externship hours)*	**Reporting category** existing rule term 6E-1.003(26)
Level 1 location	└─ **DISTANCE INSTRUCTION**	**Reporting category** existing rule term 6E-1.003(39)
Level 2 timing	├─ **Synchronous**	**Existing rule** existing rule term 6E-1.003(61)
Level 2 timing	└─ **Asynchronous**	**Existing rule** existing rule term 6E-1.003(8)

PROGRAM-LEVEL LABELS *(derived from the components above; not separate kinds of instruction)*
Location label: In-person · Online · Hybrid
Timing label (Online and Hybrid only): Synchronous · Asynchronous · Blended (both)

CROSS-CUTTING DIMENSION *(asked of every program, in-person and distance alike; does not change the label)*
AI in instruction (check any): None · Teaches content · Tutors or gives feedback · Personalizes learning paths · Assesses student learning
Recorded by function: what the AI does, not how much of the program it is

3.1 Level 0: Scope (defined by the institution's program)

Required Instruction. The instruction the institution's program requires every student to complete for the credential, as stated in the institution's program outline and counted in its clock or credit hours. It includes whatever laboratories, clinical rotations, externships, or practicums the program requires. The institution defines these requirements, and the Commission evaluates them under its existing standards and any applicable licensing-body requirements. For reporting delivery, the framework only asks the institution to report against what it requires.

Optional Component. Any activity the institution offers that a student may take part in but is not required to complete. Examples are optional in-person or live online sessions, tutoring, and in-person attendance that a student may replace with distance attendance (P4). Optional components do not change the label. For Online programs the form asks one question: are optional in-person components offered, such as an internship, lab, in-person experience, or tutoring (None, or Offered with a short description)? General student support services (advising, library, career services) are not reported. The contrast with Hybrid is the word *required*: in a Hybrid program, in-person instruction is required; in an Online program with an optional in-person component, students may complete the program without it, so the program stays Online.

3.2 Level 1: Location (reporting category, using existing rule terms)

In-person Instruction. Required instruction delivered as Direct Contact Instruction, defined in Rule 6E-1.003(26), F.A.C., as "the physical presence of one or more students and one or more instructors at the same physical location." The location may be a licensed location, auxiliary classroom space, or a supervised clinical, externship, or practicum site. The framework calls this category *In-person* rather than "on-site" because the rule's test is a shared physical location, not the school's own site: clinicals and externships happen at the clinical or employer site, and they are still in-person instruction.

Distance Instruction. Required instruction delivered as Indirect Contact Instruction, defined in Rule 6E-1.003(39), F.A.C., as "a delivery method which does not require the physical presence of students and instructors at the same location, but provides for interaction between students and instructors..."

Level 1 is where the shared vocabulary matters most. These two existing rule terms are the reporting categories every institution uses, so that labels can be compared across institutions. The institution decides how its program is delivered. The categories only record it.

3.3 Level 2: Timing (applies to distance instruction only)

Synchronous. Uses the existing rule definition without change: "students must participate, electronically or by other means, in a distance educational program simultaneously, regardless of time zones" (Rule 6E-1.003(61), F.A.C.). What makes a session synchronous in a particular program (for example, scheduled live online sessions with instructor contact) is described by the institution in its program description. The framework does not set a minimum.

Asynchronous. Uses the existing rule definition without change: "students may access a prepared educational program electronically or by other means, at a time of their own choosing rather than at a specified time" (Rule 6E-1.003(8), F.A.C.).

3.4 Correspondence (existing rule term; no separate form box)

Correspondence. Rule 6E-1.003(21), F.A.C., defines "Correspondence Learning" as "instruction through mail or e-mail requiring the institution to mail a syllabus, texts, lessons, and other materials to the student and to provide adequate educational services, responses, comments, and evaluations in a timely manner to the student." It has its own requirements in Rule 6E-2.0041(4)(b) and (10)(c). For delivery reporting it is asynchronous distance instruction, and it is reported as Asynchronous. The current Program Outline's "Correspondence" box, which sat next to "Campus" as if it were a location, is retired; the rule's text on correspondence is not amended.

3.5 Cross-cutting dimension: AI in instruction

Location and timing describe *where* and *when* instruction happens. A separate question is *what AI does* in the program's required instruction. The question applies to in-person and distance instruction alike, so it sits beside the hierarchy rather than inside it, and it does not change the seven labels.

It is recorded by function, not by degree. Categories based on how much a program relies on AI ("supported," "primary," "native") blur over time and invite argument about where the line falls. What the software does is a stable, structural fact. The form offers four functions, check any that apply, or None:

- **Teaches content.** AI presents required content to the student: lessons, explanations, re-teaching. *Counts:* an AI tutor that delivers a lesson and re-explains it when a student is stuck. *Does not count:* an instructor using AI to prepare materials that the instructor then teaches.
- **Tutors or gives feedback.** AI responds to the individual student: answers questions, gives feedback on work. *Counts:* feedback on each student's practice problems. *Does not count:* help-desk or enrollment chatbots.
- **Personalizes learning paths.** AI decides what each student does next: sequence, pace, level, recommended activities. *Counts:* adaptive modules that choose the next activity from a student's results. *Does not count:* a fixed syllabus every student follows in the same order.
- **Assesses student learning.** AI evaluates student work or progress in a way that counts toward grades, progression, or completion: scoring, competency determinations. *Does not count:* auto-marking against a fixed answer key, or feedback on ungraded practice (that is "Tutors or gives feedback").

An optional "Describe" line lets the institution say in a few words what it uses. The pattern of boxes, together with that description and the program description, is how a program built around AI shows what it does. A school may still call itself "AI-native" or similar in its own description; that phrase is not a framework category. Tools that do none of the four (spelling and grammar aids, search tools) are not reported.

Tie to existing rule words. Rule 6E-2.0041(7), F.A.C., requires institutions offering nontraditional programs to "employ or contract with appropriately qualified instructors sufficient in number to provide the instruction, student interaction, and learning outcomes evaluation necessary for the institution to document achievement of its stated purpose, and for students to achieve the specific learning objectives and competencies required for each program so offered." Teaches content maps to "the instruction," Tutors or gives feedback to "student interaction," and Assesses student learning to "learning outcomes evaluation." Personalizing learning paths is part of how instruction is organized. Because the rule's existing words already cover these functions, no new rule definition is proposed. For clock-hour programs, Rule 6E-1.003(15), F.A.C., also applies: ""Clock Hour" means a period of 60 minutes with a minimum of 50 minutes of instruction in the presence of an instructor."

A reporting category only. The institution decides whether and how to use AI. The Commission reads the answers against the program description and the standards that already apply.

4. Program-Level Labels

Program labels summarize the components of the hierarchy as a single student would experience them.

Location label (all programs):

- **In-person.** All required instruction is in-person instruction.
- **Online.** All required instruction is distance instruction.
- **Hybrid.** Required instruction includes both in-person and distance instruction.

Timing label (Online and Hybrid programs only; it does not apply to In-person programs):

- **Synchronous.** All distance instruction is synchronous.
- **Asynchronous.** All distance instruction is asynchronous, including correspondence.
- **Blended.** Distance instruction includes both synchronous and asynchronous instruction.

Combined, the labels give seven possible classifications. They are written with the location first, and "Blended" never appears alone. In general use "blended" often means "hybrid," so it is always qualified.

	Synchronous	Blended (both)	Asynchronous
Online	**OS** Online, Synchronous (OS)	**OB** Online, Blended (OB)	**OA** Online, Asynchronous (OA)
Hybrid	**HS** Hybrid, Synchronous (HS)	**HB** Hybrid, Blended (HB)	**HA** Hybrid, Asynchronous (HA)
In-person	**IP** In-person (IP). Timing label does not apply.		

The two-letter codes are shorthand for staff and data systems. Forms ask the questions directly (Section 6) and the code is derived from the answers.

Reported beside the label. The AI in instruction answer is reported next to the label as its own answer, for example "Online, Asynchronous; AI in instruction: Tutors or gives feedback, Personalizes learning paths." It never changes the label, and there are no further label variants. Likewise, an Online program with an optional in-person component (for example an optional internship) is still Online: in-person instruction is optional, not required. If any in-person instruction is required, the program is Hybrid.

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4.1 Decision procedure

1. Start from the instruction the institution's program requires, as the institution states it and counts it (P1, P2). Report any in-person session a student may attend remotely as an optional in-person component (P4).
2. **Location.** If there is no distance instruction, the program is In-person. If there is no in-person instruction, it is Online. Otherwise it is Hybrid.
3. **Timing** (Online or Hybrid only). If only synchronous components exist, it is Synchronous. If only asynchronous components exist, including correspondence, it is Asynchronous. If both exist, it is Blended.
4. Where a program has alternative formats (for example, a campus track and an online track), classify each format separately.
5. Record the AI in instruction answer and, for Online programs, any optional in-person components (Section 6), and apply the staff review prompts (Section 8).
6. **Confirm.** Ask the institution whether the label describes the program as students actually experience it. If it does not, recheck the facts. Do not choose a different label to match a preferred description.

In-person instruction required?	Synchronous distance?	Asynchronous distance?	Label
Yes	No	No	**In-person (IP)**
No	Yes	No	**Online, Synchronous (OS)**
No	No	Yes	**Online, Asynchronous (OA)**
No	Yes	Yes	**Online, Blended (OB)**
Yes	Yes	No	**Hybrid, Synchronous (HS)**
Yes	No	Yes	**Hybrid, Asynchronous (HA)**
Yes	Yes	Yes	**Hybrid, Blended (HB)**

5. What the Current Forms Capture

Form	Current delivery field	Assessment
Form 301, Program Outline: diploma programs (Effective 07/08)	Program Delivery: □ Campus □ Online □ Correspondence □ Other (describe)	Mixes levels: Correspondence is a kind of asynchronous distance instruction, not a peer of Campus, so the proposed revision retires that box and reports correspondence as Asynchronous. Has no Hybrid option, so hybrid programs fall into "Other" and cannot be compared. Has no timing.
Form 302, Program Outline: occupational associate degree and higher (Effective 07/08)	The same four checkboxes	The same issues as Form 301.

Form	Current delivery field	Assessment
Forms 301 and 302 hours and course table	Hours: Clock · Theory · Lab · Externship · Credit (Form 301). Course table: Course # · Title · Clock hrs · Credit hrs · Services	The hours split already gives the in-person setting at no added burden. The course table does not tie delivery to courses, so staff cannot check the program-level answer against the courses.
Form A, Online Program Addition (Rule 6E-2.0041)	Program status · Platform · Program Delivery: □ 100% Online □ Hybrid / □ Synchronous □ Asynchronous · Student/faculty ratio · Learning resources · Accreditor approval	Already structured correctly: location, then timing for distance programs only. Uses different vocabulary from Forms 301 and 302. Used only for online additions, so in-person programs never report delivery in the same terms.

Conclusion. The fix belongs on the form every program already completes. Forms 301 and 302 keep their layout; only their Program Delivery row changes, to four short checkbox rows in the framework's words, and the course table gains one Delivery column. Every program, including in-person programs, then reports delivery in one vocabulary. Form A remains the Commission's existing form; the framework recommends only that its delivery checkboxes use the same words.

6. Proposed Revision to the Program Outline (Forms 301 and 302)

The Program Outline stays the same form, with the same look. Only the rows shown below change; every other blank (institution data, hours, cost, admission requirements, objective, description, course table, equipment, textbooks) stays exactly as it is today. There is no separate delivery form.

PROGRAM OUTLINE, FORMS 301 AND 302 (proposed revision)

Same form, same look. Only these rows change; every other blank stays as it is today.

A PROGRAM DATA

the Program Delivery rows replace "Campus / Online / Correspondence / Other"

Program Delivery: □ In-person □ Online □ Hybrid (in-person and online)

If Online or Hybrid, the online instruction is: □ Synchronous □ Asynchronous □ Blended (both)

AI in instruction (check any): □ None □ Teaches content □ Tutors or gives feedback □ Personalizes learning paths □ Assesses student learning Describe (optional): ____

If Online: optional in-person components (e.g., internship, lab, tutoring): □ None □ Offered (describe): ____

(Report how the instruction the program requires is delivered. If the program is offered in more than one format, complete a separate outline for each format.)

B PROGRAM BREAKDOWN BY COURSE

one narrow column added

Course Number · Course Title · Clock Hours · Credit Hours · Services · Delivery (In-person / Online / Hybrid)

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C FOOTER
revision line

Form 301 (Revised, proposed 11/2026) · Form 302 (Revised, proposed 11/2026)

The first two rows are the label: for example Online + Asynchronous reads "Online, Asynchronous." The AI in instruction row is answered by every program, including In-person programs, and is reported beside the label. The optional in-person row is answered only by Online programs; general student support services (advising, library, career services) are not reported. A course's Delivery uses the same three location words, so staff can check the program-level answer against its courses.

How the program runs its live sessions, how instructors interact with students, and how it uses software are not new form fields. For nontraditional programs, Rule 6E-2.0041(1)(c)2., F.A.C., already asks for "A detailed description of how each program will be conducted, including submission of detailed course outlines, procedures for distribution of materials, examination and evaluation of student work, timely response to students' questions and comments, record keeping, appropriate student services, and technical support."

6.1 Burden compared with value

Field	Burden on the institution	Value to the Commission and students	Recommendation
Program Delivery: In-person / Online / Hybrid	Trivial. Replaces today's four boxes.	High. It is the core classification and removes "Other."	**Capture**
Online instruction: Synchronous / Asynchronous / Blended	Trivial. One box, Online and Hybrid only.	High	**Capture**
AI in instruction (check any): None / Teaches content / Tutors or gives feedback / Personalizes learning paths / Assesses student learning, with an optional short description	Low. One row of checkboxes, every program.	High and rising. Shows what AI does in instruction in stable, shared words, and lets programs built around AI show it plainly.	**Capture**
If Online: optional in-person components (e.g., internship, lab, tutoring): None / Offered (describe); general student support services not reported	Trivial. One box and a few words, Online programs only.	Medium. Shows options that do not change the label, so students and staff can see what is optional.	**Capture**
Course table "Delivery" column (In-person / Online / Hybrid)	Low. Courses are already listed.	High. Lets staff check the program-level answer against the courses.	**Capture**

Field	Burden on the institution	Value to the Commission and students	Recommendation
Correspondence as a separate box	Trivial	Correspondence is a kind of asynchronous instruction and is reported as Asynchronous; its rule requirements apply as they do today.	**Do not capture**
Hybrid share (percentage online) and its basis	Low to moderate	Not equally applicable across the range of licensed programs; the course table already shows which courses are online.	**Do not capture**
Detail of optional components (kinds of sessions or services)	Low	Not equally applicable across the range of licensed programs.	**Do not capture**
Synchronous session details (kinds, frequency, attendance)	Moderate	Already covered by the narrative description Rule 6E-2.0041(1)(c)2. asks of nontraditional programs.	**Do not capture**
Instructor interaction in asynchronous instruction (methods, frequency, response time)	Moderate	Already covered by the narrative description Rule 6E-2.0041(1)(c)2. asks of nontraditional programs.	**Do not capture**
Detail of AI use (uses, oversight, vendor)	Moderate	Already covered by the narrative description Rule 6E-2.0041(1)(c)2. asks of nontraditional programs.	**Do not capture**
Form A items carried onto the outline (status, platform, ratio, learning resources, accreditor approval)	Low	Form A remains the Commission's existing form for online additions.	**Do not capture** on the outline
Per-course split of hours into synchronous and asynchronous	High	Low	**Do not capture**
Share of hours delivered by AI, or a degree category (how much a program relies on AI)	High, and not reliably measurable	Degree categories blur over time; the four functions are stable	**Do not capture**
Pedagogical descriptors (flipped, cohort)	Low	Low for regulation	**Do not capture**

7. AI in Instruction

AI now teaches, tutors, adapts, and assesses in some programs, and some programs are designed around it. The framework records this as a classification matter, with one row on the form:

1. **It is a separate dimension, not a delivery modality.** Delivery categories named after a technology go out of date. Rule 6E-1.003 still lists "facsimile transmission" and "Media and Computer Assisted Learning". AI in instruction is therefore not a location or a timing. It answers

a different question, what software does in the instruction, which applies to in-person and distance instruction alike (Section 3.5). The seven labels stay as they are.

2. **It is recorded by function.** Teaches content; Tutors or gives feedback; Personalizes learning paths; Assesses student learning; or None. Each function has a plain test, with what counts and what does not (Section 3.5). Functions are stable as tools change; degree categories ("supported," "native") blur.
3. **It is one row, answered by every program.** Check any that apply, with an optional short description. The form asks for no percentage. How the institution uses AI, and how instructors guide and evaluate it, are described in its own words in the program description and, for nontraditional programs, in the documentation Rule 6E-2.0041(1)(c)2. already asks for.
4. **It is recorded, not prescribed.** The institution decides whether and how to use AI. The pattern of boxes plus the description is how a pioneering program distinguishes itself. Existing rule words already cover the functions: "the instruction, student interaction, and learning outcomes evaluation" in Rule 6E-2.0041(7), F.A.C. When AI teaches content or assesses student learning, staff review prompt F8 points to how instructors guide, oversee, and evaluate that work, and in clock-hour programs to the clock hour's "minimum of 50 minutes of instruction in the presence of an instructor" (Rule 6E-1.003(15)). Whether instruction taught by AI can count toward clock hours is left as a policy choice (Section 11).

8. Staff Review Prompts

These prompts help staff connect the form's answers to requirements that already exist. They are **not form questions**. A prompt is not a finding of noncompliance. It points to something to check.

Prompt	Raised when	What to verify	Authority
F1: Correspondence	The program description indicates instruction by mail or e-mail, **or** that instructor contact is limited or mostly initiated by students	Whether correspondence requirements are met: qualified faculty design content; each lesson is evaluated and returned in a timely way; the catalog shows progress schedules	Rule 6E-1.003(21); 6E-2.0041(4)(b), (10)(c), F.A.C.; 34 CFR 600.2 (correspondence is not distance education)
F2: Clock-hour measurement	Clock-hour program with any distance instruction	A clock hour is "a period of 60 minutes with a minimum of 50 minutes of instruction in the presence of an instructor." How distance hours are measured and how instructor presence is established.	Rule 6E-1.003(15), F.A.C.
F3: Hands-on skills	Program requires manual, technical, laboratory, or clinical skills **and** is Online	Documented, supervised practical experience for every student. If an in-person practical is required, the program is actually Hybrid.	Rule 6E-2.0041(4)(c), (9), F.A.C.

Prompt	Raised when	What to verify	Authority
F4: Nontraditional delivery documentation	Online or Hybrid	Equipment inventory, course outlines, materials distribution, evaluation of student work, response times, technical support, instructor competence, library access, exam security, catalog disclosures	Rule 6E-2.0041(1)(c), (7), (8), (10); 6E-2.004 (catalog), F.A.C.
F5: Federal 50% threshold	The program is Online, or Hybrid with half or more of its courses or hours marked Online in the course table, and the institution is accredited by a USDE-recognized agency	Whether the accreditor has approved distance education	34 CFR 602.22(a)(1)(ii)(C); USDE Dear Colleague Letter GEN-23-09 (May 2023). 2026 rulemaking proposes revisions; confirm the current text.
F6: PhD by distance	PhD, any distance instruction, no USDE-recognized accreditation	Prohibited without appropriate accreditation	Rule 6E-2.0041(2)(b), F.A.C.
F7: Change of delivery	The label differs from the one on file for an approved program	Prior approval may be required before implementation	Rule 6E-2.008(1), F.A.C.
F8: AI teaches content or assesses learning	AI in instruction includes "Teaches content" or "Assesses student learning"	How instructors guide, oversee, and evaluate that work, as the program description shows; that qualified instructors are "sufficient in number to provide the instruction, student interaction, and learning outcomes evaluation necessary for the institution to document achievement of its stated purpose"; in clock-hour programs, how clock hours, which require "a minimum of 50 minutes of instruction in the presence of an instructor", are counted. No prompt is raised for Tutors or gives feedback or Personalizes learning paths alone.	Rule 6E-2.0041(7); 6E-1.003(15), F.A.C.
F9: Optional in-person components on an online program	The program is Online and optional in-person components are "Offered"	Whether marketing and enrollment materials describe the optional component as optional, and whether any in-person activity is in fact required, in which case the program is Hybrid.	Section 1005.04(1)(e), F.S.; Rule 6E-1.0032(4), F.A.C.

9. Worked Examples

#	Program facts (required instruction only)	Form answers	Label · prompts
1	Medical assistant diploma, 720 clock hours, all classes on campus. Homework is posted online.	In-person · AI None	**In-person (IP)**. Homework is preparation (P2).
2	MBA. All courses meet weekly by live video. Students may also use the library on campus.	Online · Synchronous · AI None · Optional in-person None (the library is a general student support service)	**Online, Synchronous**. F4.
3	RN-to-BSN. Modules students work through on their own time; faculty give weekly feedback and lead discussions.	Online · Asynchronous · AI None	**Online, Asynchronous**. F4.
4	Lessons sent by e-mail and completed on the student's own time; students return work by e-mail and faculty respond only when contacted.	Online · Asynchronous · AI None	**Online, Asynchronous**. F1 (from the description), F4.
5	Online certificate: recorded lectures plus a required weekly live seminar.	Online · Blended · AI None	**Online, Blended**. F4.
6	Phlebotomy, clock hours: online theory 40 h (asynchronous), campus lab 40 h, externship 40 h.	Hybrid · Asynchronous · AI None · course Delivery Online, In-person, In-person	**Hybrid, Asynchronous**. F2, F4.
7	Practical nursing: theory by live video (450 h), skills lab on campus and clinicals at hospital sites (900 h).	Hybrid · Synchronous · AI None · course Delivery Online, In-person	**Hybrid, Synchronous**. Clinicals at a hospital are in-person instruction. F2, F4.
8	Doctorate (accredited): asynchronous coursework, weekly live sessions, one required residency week.	Hybrid · Blended · AI None	**Hybrid, Blended**. F4, F5.
9	Every class meets in a room and is live-streamed; students may attend either way.	Online · Synchronous · AI None · Optional in-person Offered ("attend class in person")	**Online, Synchronous** (P4). F4, F9.
10	In-person course; students watch short videos before class ("flipped"), and the videos are not counted as instruction.	In-person · AI None	**In-person (IP)**. Flipped is pedagogy (P6).
11	Two tracks: fully on campus, or fully online asynchronous.	A separate outline for each format	Track 1 **In-person**; Track 2 **Online, Asynchronous**, F4.
12	Online asynchronous certificate, clock hours. Instructors teach and grade the course; in required practice modules an AI tutor responds to each student's work with feedback.	Online · Asynchronous · AI Tutors or gives feedback ("AI tutor feedback on practice modules")	**Online, Asynchronous**; AI in instruction: Tutors or gives feedback. F2, F4.

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#	Program facts (required instruction only)	Form answers	Label · prompts
13	Online certificate, credit hours, designed around an AI tutor that delivers the lessons, answers each student's questions, and adapts the sequence to each student; competency checks scored by the AI count toward completion; instructors guide progress weekly and evaluate the final projects.	Online · Asynchronous · AI Teaches content, Tutors or gives feedback, Personalizes learning paths, Assesses student learning ("AI tutor; instructors guide and evaluate projects")	**Online, Asynchronous**; AI in instruction: all four. F4, F8.
14	In-person welding diploma, clock hours. In the shop, students use a simulator whose software responds to each weld with feedback, alongside instructor demonstrations and checks.	In-person · AI Tutors or gives feedback ("weld simulator feedback")	**In-person (IP)**; AI in instruction: Tutors or gives feedback.
15	Online medical coding diploma with an optional in-person internship at a partner clinic.	Online · Asynchronous · AI None · Optional in-person Offered ("optional internship")	**Online, Asynchronous**. The internship is optional, so the program stays Online; if it were required, the program would be Hybrid. F4, F9.

10. Proposed Rule Language (Discussion Draft)

> *The proposal amends two existing rules, 6E-1.003 and 6E-2.004. It does not create a new rule or a new form: the Program Outline (Forms 301 and 302) is revised as shown in Section 6. The current text below is copied verbatim from the latest versions on flrules.org. New text is underlined and removed text is struck through, the convention used in Florida rule amendments. Adoption would require rulemaking under Chapter 120, F.S.*

Legend: Underlined text is new; ~~struck-through text is removed~~.

Rule 6E-1.003, F.A.C., Definition of Terms (current version effective 2/20/2024)

Adds the delivery labels to the existing definition of "Program." Nothing is renumbered.

> (53) “Program” means a prescribed group of courses, taken in the proper sequence to attain mastery of a body of knowledge or set of skills, and leading to a certificate, diploma, or degree. A program’s delivery is reported as “In-person” when all instruction the program requires is direct contact instruction, “Online” when all of it is indirect contact instruction, or “Hybrid” when it includes both. For online and hybrid programs, the indirect contact instruction is reported as “Synchronous,” “Asynchronous,” or “Blended” (both).

Why: *The labels use the rule’s existing terms (direct and indirect contact instruction, synchronous, asynchronous). “In-person” is used because direct contact instruction is a shared physical location, including clinical and externship sites. The text describes how a program is delivered; it does not set what a program must require. Placing it in the existing definition avoids renumbering, so cross-references such as subsection 6E-1.003(55) stay correct. No AI definition is proposed: the form records AI in instruction by function, which existing rule words already cover.*

> Rulemaking Authority 1005.22(1)(e) FS. Law Implemented 1005.22, 1005.31, 1005.385 FS. History–New 12-5-74, Amended 7-28-75, Formerly 6E-4.01(8), Amended 11-11-75, 3-7-77, 10-13-83, Formerly 6E-1.03, Amended 2-22-89, 11-29-89, 10-19-93, 4-11-00, 1-7-03, 12-23-03, 7-20-04, 3-28-05, 6-13-05, 2-20-06, 7-23-07, 1-11-12, 2-20-24, _____.

Why: *Amendment date added at adoption.*

Rule 6E-2.004, F.A.C., Standards and Procedures for Licensure (current version effective 8/27/2024)

Says where delivery is reported, after the existing paragraph (4)(s).

> (s) All institutions licensed by the Commission must disclose all avocational programs, examination preparation programs, contract training programs, continuing education, or professional development programs offered on CIE Form 303 [Program Disclosure]. This form is incorporated by reference, (http://www.flrules.org/Gateway/reference.asp?No=Ref-16362) effective February 2024. CIE Form 303 may be obtained, without cost, from the Commission's website at https://www.fldoe.org/policy/cie or by writing to the Commission for Independent Education, 325 West Gaines Street, Suite 1414, Tallahassee, Florida 32399-0400. All institutions applying for annual license or license by means of accreditation after February 2024 by the Agency Clerk] must submit CIE Form 303 with the application.
>
> (t) Each institution shall report the delivery of each program, as described in subsection 6E-1.003(53), F.A.C., on the program outline it submits for the program. A program offered in more than one format shall be reported on a separate program outline for each format.

Why: *Delivery is reported on the Program Outline every program already submits, in the defined words, with one outline per format.*

> Rulemaking Authority 1005.22(1)(e), 1005.31(2), (3), 1005.34, 1005.39 FS. Law Implemented 1005.04, 1005.31, 1005.33(1), 1005.34, 1005.39 FS. History–New 12-5-74, Formerly 6E-3.01(1), Amended 11-11-75, 3-7-77, 5-7-79, 10-13-83, Formerly 6E-2.04, Amended 11-27-88, 11-29-89, 12-10-90, 10-19-93, 4-2-96, 4-11-00, 1-7-03, 4-5-04, 5-24-04, 7-20-04, 5-18-05, 7-10-06, 7-23-07, 1-11-12, 7-11-13, 10-22-13, 2-20-24, 8-27-24, _____.

Why: *Amendment date added at adoption.*

11. Policy Choices for Commission Decision

#	Question	Recommended default	Alternative	Rationale
1	Should the Commission define AI terms in rule?	**Not now.** The form records AI in instruction by function, and the rule's existing words ("the instruction, student interaction, and learning outcomes evaluation") already cover the functions.	Define the four functions, or other AI terms, in Rule 6E-1.003	The Commission may wish to define terms later, once it has seen what institutions report.
2	Should the Commission define synchronous beyond Rule 6E-1.003(61)?	**No.** The institution describes its practice.	Require instructor presence and interaction	Programs differ legitimately. Description shows the differences without freezing one model in place.
3	Can instruction taught by AI count toward clock hours?	Decide explicitly. Under the current wording ("presence of an instructor") this is doubtful.	Allow with documented equivalency; or prohibit	Prompt F8 raises the question for clock-hour programs until the Commission decides.
4	Should a small required component change the label (e.g., a 2-hour online orientation in a 900-hour campus program)?	**Yes.** Any required component counts, and the course table shows where it is.	A de minimis threshold	A bright line is simple to apply and hard to game.
5	Should "Distance Learning" (28), "On-line Courses" (50), and "Media and Computer Assisted Learning" (45) be retained?	Repeal or cross-reference them once program delivery is adopted	Keep	Overlapping terms are the source of the current inconsistency.
6	Should Form A (Online Program Addition) use the same words?	**Yes.** Align its delivery checkboxes with the labels; keep its other items.	Leave Form A as is	One vocabulary across the Commission's forms.

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Appendix A. Revision Notes

v1.2 (November 2026).

- Simplified the proposed form. There is no separate Program Delivery form: the Program Outline (Forms 301 and 302) keeps its look, and only its Program Delivery row changes, to four short checkbox rows and one instruction line in the framework's words, plus a Delivery column in the course table.
- Removed from the form the hybrid percentage and basis, program status, the optional-component detail, the synchronous-session and asynchronous-interaction details, the AI detail, and the Form A carry-over. They were not equally applicable across the range of licensed programs or are already covered by the narrative description Rule 6E-2.0041(1)(c)2. asks of nontraditional programs. Form A remains the Commission's existing form.
- Added AI in instruction as a separate, cross-cutting dimension answered by every program and recorded by function (check any): Teaches content, Tutors or gives feedback, Personalizes learning paths, Assesses student learning, or None, with an optional description (Section 3.5). Degree categories were considered and set aside because they blur over time. It does not change the seven labels. Rewrote Section 7 around it.
- Retired the Program Outline's "Correspondence" box: correspondence remains an existing rule term and is reported as Asynchronous (Section 3.4).
- Kept one optional-component question, for Online programs only: optional in-person components such as an internship, lab, or tutoring (None, or Offered with a description); general student support services are not reported.
- Named the first location label In-person. Direct contact instruction is a shared physical location, which includes clinical and externship sites, not only the school's own site.
- Aligned every surface on one vocabulary: In-person / Online / Hybrid; Synchronous / Asynchronous / Blended; the four AI functions.
- Reduced the rule language to two amendments: the delivery labels inside the existing definition of "Program" (no renumbering), and one paragraph in Rule 6E-2.004 on where delivery is reported. No AI definition is proposed; existing rule words cover the functions.
- Updated the staff review prompts (F1 and F5 no longer depend on form fields that were removed; F8 covers AI that teaches content or assesses learning; F9 covers optional in-person components on Online programs) and the worked examples.

v1.1 (November 2026).

- Added the hierarchy of definitions (Section 3). Synchronous, asynchronous, and correspondence now apply only to distance instruction. Hybrid and blended are program-level summary labels.
- Reframed as a reporting framework. The institution defines its program and its required instruction, and the Commission evaluates it under existing standards. The framework supplies only the reporting categories, all of them existing rule terms.
- Removed the Commission-set basis for the hybrid share, the proposed instructor-presence test for synchronous, and any AI standard; added the assessment of the current forms (Section 5),

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the burden-versus-value assessment (Section 6.1), the treatment of AI (Section 7), and staff review prompts in place of form flags.

v1.0 (corrections to the original draft "Program Delivery Modalities: Definitions"), retained:

- "Blended" had two conflicting definitions. It now has one and is always qualified.
- "Hybrid" was both a modality and a family of modalities. It is now a location label only.
- "Flipped" was listed as a modality. It is now treated as pedagogy (P6).
- The survey branching had placeholder questions ("Q#"), questions that could not be reached, and answer options that did not exist. It has been replaced by the form rows and decision table.
- There was no test separating instruction from homework. Added P2.
- There was no rule for a choice of in-person or remote attendance. Added P4.
- The definitions did not cite existing Florida terms. They now build on Rule 6E-1.003.

Sources

- Rule 6E-1.003, F.A.C., Definition of Terms (amended 2-20-24).
- Rule 6E-1.0032, F.A.C., Fair Consumer Practices.
- Rule 6E-2.0041, F.A.C., Delivery of Programs Through Nontraditional Assessments, Modes and Methods (amended 7-23-07).
- Rule 6E-2.004, F.A.C., Standards and Procedures for Licensure (amended 8-27-24).
- Rule 6E-2.008, F.A.C., Approval of Modifications.
- Sections 1005.04 and 1005.22(1)(e), F.S.
- CIE Program Outline forms, Form 301 (diploma) and Form 302 (degree), Effective 07/08, as published on the Commission's New Institution Application page; Online Program Addition (Form A), as seen in institution applications.
- 34 CFR 600.2, definitions of "distance education" and "correspondence course."
- 34 CFR 602.22(a)(1)(ii)(C), and U.S. Department of Education, Dear Colleague Letter GEN-23-09 (May 18, 2023).

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